

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Citibank August 11, 2020 Wire Transfers

No. 20 Civ. 06539 (JMF)

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, this action concerns funds that were paid on August 11, 2020 to entities, including non-Defendant lenders, customers, funds, CLOs, or accounts (the “Non-Defendant Funds”) managed or advised by Brigade Capital Management, LP, HPS Investment Partners, LLC, Symphony Asset Management, LLC, Bardin Hill Loan Management LLC, Investcorp Credit Management US LLC, Greywolf Loan Management LP, Zais Group LLC, Allstate Investment Management Company, Medalist Partners Corporate Finance LLC, Tall Tree Investment Management LLC, and New Generation Advisors LLC (collectively, the “Defendants”);

**IT IS HEREBY AGREED AND ORDERED THAT:**

1. Each Defendant will comply with any and all applicable orders of the Court and take all reasonable steps to direct and/or request that the various Non-Defendant Funds managed or advised by such Defendant comply with any and all applicable orders of the Court.
2. Each Defendant will not assert that orders of the Court do not apply to the Non-Defendant Funds managed or advised by such Defendant.
3. Each Defendant will request that the Non-Defendant Funds managed or advised by such Defendant inform the Defendant promptly if they do not intend on complying with applicable orders of the Court, and each Defendant will inform Citibank, N.A., through counsel, promptly of the receipt of any such notice.

Dated: August 28, 2020  
New York, New York

MAYER BROWN LLP

By: /s/ Matthew D. Ingber

Matthew D. Ingber  
Christopher J. Houpt  
Michael Rayfield  
Allison J. Zolot  
Luc W. M. Mitchell  
Anjanique M. Watt  
1221 Avenue of the Americas  
New York, New York 10020  
(212) 506-2500

THE LAW OFFICES OF  
JOHN F. BAUGHMAN,  
PLLC

John F. Baughman  
Nathaniel Marmon  
299 Broadway, Suite 207  
New York, New York 10007  
(347) 241-6347

*Attorneys for Citibank*

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Benjamin Finestone

Michael Carlinsky  
Robert Loigman  
Benjamin Finestone  
Adam M. Abensohn  
Zachary Russell  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
(212) 849-7000

Bennett Murphy  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
(213) 443-3000

*Attorneys for Defendants*

**SO ORDERED:**

Dated: August \_\_, 2020  
New York, New York

---

HON. JESSE M. FURMAN  
UNITED STATES DISTRICT JUDGE